

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

Towanda Velez, as personal representative of the estate
of Anthony Velez, deceased,

Plaintiff,

- against -

City of New York, Rudolph Hall, Michael Ruggiero,
and J. Does 1-8,

Defendants.

04 CV 1775 (ENV)(MDG)

Notice of Motion

Please take notice that, upon all papers and proceedings had herein and upon the annexed Memorandum of Law, plaintiff will move this Court, at the Courthouse, 225 Cadman Plaza East, Brooklyn, NY, upon submission pursuant to Local Rule 6.1(b), for an order pursuant to FRCP 59 granting to plaintiff a new trial, together with such further and additional relief as the Court deems just and proper.

Dated: New York, New York
October 28, 2011

MICHAEL G. O'NEILL
(MO3957)



Attorneys for Plaintiff
30 Vesey Street, Third Floor
New York, New York 10007
(212) 581-0990